No. 95-1376

Supreme Court, U.S.
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IN THE

Supreme Court of the United States

OCTOBER TERM, 1995

CHARLES T. ROBINSON, SR.,

Petitioner,

v.

SHELL OIL COMPANY,

Respondent.

On Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

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JOINT APPENDIX

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LOCATION OF ADDITIONAL RECORD EXCERPTS NOT INCLUDED IN THE JOINT APPENDIX

3. Opinion of the United States Court of Appeals for the Fourth Circuit (in banc), November 29, 1995, reprinted in the Appendix to the Petition for a Writ of Certiorari at pages A-1 to A-29.

4. Opinion of the United States Court of Appeals for the Fourth Circuit (panel), January 13, 1995, reprinted in the Appendix to the Petition for a Writ of Certiorari at pages A-30 to A-61.

5. Memorandum of the United States District Court for the District of Maryland, April 8, 1993, reprinted in the Appendix to the Petition for a Writ of Certiorari at pages A-62 to A-63.

6. Order of the United States Court of Appeals for the Fourth Circuit (granting petition for rehearing and suggestion for rehearing in banc) entered March 1, 1995, reprinted in the Appendix to the Petition for a Writ of Certiorari at pages A-64 to A-63.

RELEVANT DOCKET ENTRIES

United States District Court for the District of Maryland

1/8/93	COMPLAINT FILED
1/25/93	MOTION by Charles T. Robinson, Sr. for appointment of counsel.
3/24/93	MOTION with memorandum in support by Shell Oil Company to Dismiss for Failure to State a Claim
4/8/93	MEMORANDUM (signed by Judge J. F. Motz)
4/8/93	ORDER granting motion of Defendant to Dismiss for Failure to State a Claim; and DISMISSING this Action.
5/7/93	NOTICE OF APPEAL by Charles T. Robinson, Sr.

United States Court of Appeals for the Fourth Circuit

5/11/93	Civil case docketed.
12/14/93	Motion filed by Appellant Charles T. Robinson to proceed on appeal in forma pauperis
1/6/94	COURT ORDER filed denying motion to proceed on appeal ifp.
2/3/94	Appearance form filed by Allen Martin Lenchek for Appellant Charles T. Robinson.

4/7/94	Brief and joint appendix filed by Appellant Charles T. Robinson.
4/25/94	Motion filed by Amicus Curiae EEOC to file brief in its present form.
5/11/94	CLERK ORDER FILED granting motion to file brief as is.
5/11/94	Amicus curiae brief filed by Amicus Curiae EEOC.
5/19/94	Brief filed by Appellee Shell Oil Company.
7/7/94	Supplemental authorities (FRAP 28(j)) filed by Appellant Charles T. Robinson.
8/19/94	Motion filed by Amicus Curiae EEOC to participate in oral argument.
8/29/94	COURT ORDER filed granting motion by EEOC to participate in oral argument on time ceded by appellant.
9/28/94	Oral argument heard.
1/18/95	Published, authored opinion filed.
1/18/95	Judgment order filed.
1/31/95	Petition filed by Appellee Shell Oil Company for rehearing and suggestion for rehearing in banc.
3/195	COURT ORDER filed granting motion for rehearing, granting motion for suggestion for rehearing in banc.

3/1/95	Case reopened.
4/6/95	COURT ORDER filed amending order granting motion for rehearing, motion for suggestion for reh in banc.
9/5/95	Motion filed by Amicus Curiae EEOC to participate in oral argument.
9/6/95	COURT ORDER filed granting motion to participate in oral argument.
9/26/95	Oral argument heard.
11/29/95	Published, authored opinion filed.
11/29/95	Judgment order filed. Decision: Affirmed, with 2 dissents.
2/6/96	Federal Reporter Citation: 70 F.3d 325.
2/8/96	Mandate issued.

[Pro Se Complaint filed January 8, 1993, United States District Court for the District of Maryland]

[Caption Omitted]

COMPLAINT FOR RETALIATION

NOW COMES, Plaintiff, brings the complaint for racial discrimination and wrongful retaliation and avers the following:

JURISDICTION

1. This action for damages based on racial discrimination and wrongful retaliation committed by the defendants, and jurisdiction of this court is invoked pursuant to the provisions of Title VII of the Civil Rights Act of 1964, USCS, Section 2000 E, et al..

2. That jurisdiction of this court is further invoked under Title 28 United States Code, Section 1331, in that the amount of controversy exceeds the amount of $100,000.00, inclusive of interest and cost, arise under the Constitution and laws of the United States.

3. That Plaintiff is a black male of African descent and color, a citizen of the United States, and a resident of Maryland, with his post office address at 8650 Hayshed Lane, Columbia Maryland, 21045.

4. That the defendant Shell Oil Company, a Delaware Corporation, with main offices in Houston, Tx. and a subsidiary of Royal Dutch Shell Trading company of the Netherlands, authorized and registered to do business within the State of Maryland.

5. Defendant Ross Fava, at all times alleged in this complaint, was and is currently, an employee or defendant Shell Oil Company. Moreover, defendant Fava, at all times alleged in this complaint, was acting within the scope of his employment and on behalf of defendant Shell Oil Company.

STATEMENT OF FACTS

6. That at all times hereinafter Plaintiff is, and has been for eleven (11) years and seven (7) months an employee of defendant Shell Oil Company.

7. That Plaintiff was a hardworking, loyal, honest, knowledgeable employee of defendant Shell Oil Company, with many company awards, recognitions, laurel citations to his credits.

8. That on October 7, 1991, Plaintiff filed a charge with the Equal Employment Opportunity Commission (EEOC) against defendant Shell Oil Company, for racial discrimination, charge #12092-0029.

9. That since October 7, 1991, without grounds or justification, defendant Shell Oil Company has been providing false information and negative job references to perspective employers.

10. That on March 10, 1992, Plaintiff file charge, charge #12092-0769, for retaliation against in violating section 704 (A) of Title VII of the Civil Rights Act of 1964.

11. That Plaintiff having complied with all the prerequisites, was issued a Notice of Right to Sue, as pursuant to Title VII of the Civil rights Act of 1964.

WHEREFORE, the Plaintiff request:

1. That this court grant the Plaintiff a judgement against defendant Shell Oil Company in the sum of $25,000,000.00 as damages in this case together with such other reliefs as the Court deems appropriate.

2. That this Court grant the Plaintiff a judgment against defendant Ross Fava in the sum of $5,000,000.00 as damages in this case together with such other reliefs as the court deems appropriate.

3. That the defendant should be permanently

enjoined from engaging in similar unlawful practices.

4. That this Court award Plaintiff reasonable attorney fees and Court cost and any other costs deemed appropriate by this Honorable Court.

RESPECTFULLY SUBMITTED

/S/
Charles T. Robinson, Sr.